

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

5 JANE DOE, an individual using)
a pseudonym,)
6)
7 Plaintiff,)
8)
vs.) CASE NO.
9) 3:19-cv-03310-JSC
UBER TECHNOLOGIES, INC.,)
et al.,)
10 Defendants.)

REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF UBER TECHNOLOGIES, INC.
BY: MATTHEW BAKER, PMQ
VOLUME I
MONDAY, AUGUST 9, 2021

21 Stenographically Reported by:
22 LISA RICHARDSON, RMR, CRR, RPR, CSR No. 5883
23 Job No. 4692763
24
25 PAGES 1 - 319

1 A Yes.

2 Q Did Uber reactivate him on probation?

3 A Can you clarify the terminology?

4 Q Well, was his status, for example, as

5 reflected in Exhibit 4, any different than his

11:08:09

6 status as it had been before this report of a sexual

7 assault?

8 MS. HUSSEY: Objection; vague.

9 THE WITNESS: When we are referring to

10 "Status" here, I was looking at Exhibit 4 in the

11:08:22

11 second column, the Status was put back to Active.

12 So that active status is the same active status as

13 it was prior to the report. There's no indication

14 within the Status of any type of probation or

15 anything of that nature.

11:08:39

16 BY MS. PETERS:

17 Q And on January 5 when he had been
deactivated for a short time, Mr. Sherman was unable
to log in to the driver app, right?

20 A Yes.

11:08:52

21 Q On January 6th when he was reactivated, he
could again log in to the driver app, right?

23 A Yes.

24 Q And on January 6th when he was reactivated,
Mr. Sherman could again accept rides that he was

11:09:04

1 matched with through the Uber app, right?

2 A Yes.

3 MS. HUSSEY: Objection; vague.

4 BY MS. PETERS:

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 Q But he could be matched with any other
10 riders, including women as well as men, right? 11:09:27

11 A Yes.

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 Q And Uber did not put any warnings on
17 Mr. Sherman's account that would be received by
18 riders that he was picking up regarding the fact
19 that he had been accused of a sexual assault, true?

20 MS. HUSSEY: Objection; vague, lacks 11:09:52
21 foundation.

22 THE WITNESS: Could you ask the question
23 again? I want to make sure I understand.

24 BY MS. PETERS:

25 Q On January 6th when Mr. Sherman was allowed 11:10:01

1 STENOGRAPHIC COURT REPORTER'S CERTIFICATE
2

3 I, the undersigned, a Stenographic
4 Certified Shorthand Reporter of the State of
5 California, do hereby certify:

6 That the foregoing proceedings were taken
7 before me remotely; that any witnesses in the
8 foregoing proceedings, prior to testifying, were
9 duly sworn; that a verbatim record of the
10 proceedings was made by me using stenographic
11 machine shorthand, to the best of my ability, which
12 was thereafter transcribed under my direction; that
13 the foregoing transcript is an accurate
14 transcription thereof.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee
17 of any attorney or any of the parties.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: August 19, 2021

22
23 
24

25 LISA RICHARDSON, RPR, CRR, RMR

CSR No. 5883